

**FILED**

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Clerk, U.S. Courts  
District of Montana  
Missoula Division

**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**JAY NEIL HEIKKILA,**

**Defendant.**

**CR 24- 5 -M- DWM**

**INDICTMENT**

**CONSPIRACY TO COMMIT MONEY  
LAUNDERING (Count 1)**

**Title 18 U.S.C. § 1956(h)**

**(Penalty: 20 years of imprisonment,  
\$500,000 fine, and three years of supervised  
release)**

**MONEY LAUNDERING – PROMOTION  
(Counts 2-24)**

**Title 18 U.S.C. § 1956(a)(1)(A)**

**(Penalty: 20 years of imprisonment,  
\$500,000 fine, and three years of supervised  
release)**

**CRIMINAL FORFEITURE**

**Title 18 U.S.C. § 982(a)(1)**

THE GRAND JURY CHARGES:

COUNT 1  
CONSPIRACY TO COMMIT MONEY LAUNDERING

Beginning in or about January 2021, and continuing thereafter until in or about August 2023, in Missoula and Ravalli Counties, in the State and District of Montana, and other places, the defendant, JAY NEIL HEIKKILA, and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire, confederate, and agree to conduct financial transactions that involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, with the intent to promote the carrying on of such specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A), that is, JAY NEIL HEIKKILA operated as a money mule to receive fraudulent proceeds from numerous wire fraud schemes committed within the United States, and then funneled the money to himself and others, both overseas and within the United States, in an attempt to disguise such financial transactions for the benefit of the co-conspirators, all in violation of 18 U.S.C. § 1956(h).

COUNTS 2-24  
MONEY LAUNDERING – PROMOTION

Beginning in or about January 2021, and continuing thereafter until in or about August 2023, in Missoula and Ravalli Counties, in the State and District of Montana, and other places, the defendant, JAY NEIL HEIKKILA, knowing that

the property involved in a financial transaction represented proceeds of some form of unlawful activity, conducted, and attempted to conduct, such a financial transaction that in fact involved the proceeds of specified unlawful activity, with the intent to promote the carrying on of specified unlawful activity, that is wire fraud, which is identified in the table below, all in violation of 18 U.S.C.

§ 1956(a)(1)(A).

Count	Amount	Date	Account
2	\$6,000.00	1/25/2021	Glacier Bank x9167
3	\$4,000.00	3/12/2021	Glacier Bank x9167
4	\$5,000.00	3/19/2021	Glacier Bank x9167
5	\$5,000.00	6/1/2021	Farmer's State Bank x2970
6	\$9,700.00	7/12/2021	Farmer's State Bank x3913
7	\$52,738.00	7/19/2021	Farmer's State Bank x8340
8	\$29,200.00	8/2/2021	Wells Fargo x3565
9	\$8,000.00	9/7/2021	Farmer's State Bank x2970
10	\$8,000.00	1/21/2022	Farmer's State Bank x2970
11	\$60,000.00	2/10/2022	Farmer's State Bank x2970
12	\$25,000.00	3/9/2022	Glacier Bank x9167
13	\$17,500.00	3/14/2022	Glacier Bank x9167
14	\$12,500.00	4/11/2022	First Interstate Bank x2320
15	\$13,500.00	5/31/2022	First Interstate Bank x2320
16	\$64,000.50	6/10/2022	First Interstate Bank x2320
17	\$38,500.75	6/23/2022	First Interstate Bank x7407
18	\$30,000.00	8/29/2022	First Interstate Bank x2320
19	\$9,800.00	5/23/2023	Glacier Bank x2154
20	\$38,500.00	5/30/2023	Glacier Bank x2154
21	\$96,250.00	6/5/2023	Glacier Bank x2154
22	\$20,000.00	6/20/2023	Glacier Bank x2154
23	\$7,000.00	7/19/2023	Ravalli County Credit Union x55002-120
24	\$20,000.00	8/4/2023	First Montana Bank x8118

### FORFEITURE ALLEGATION

Upon conviction of any of the money laundering offenses set forth in counts 1-24, the defendant, JAY NEIL HEIKKILA, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real and personal, which constitutes and is derived from proceeds traceable to the offense.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

\_\_\_\_\_  
FOREPERSON

*For*   
\_\_\_\_\_  
JESSE A. LASLOVICH  
United States Attorney

  
\_\_\_\_\_  
CYNDEE L. PETERSON  
Criminal Chief Assistant U.S. Attorney